



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

OCT 21 2011

REPLY TO THE ATTENTION OF

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

James Flannery  
Environmental Manager  
ArcelorMittal USA Inc. – Indiana Harbor West  
3001 Dickey Road  
East Chicago, Indiana 46312

Dear Mr. Flannery:

This is to advise you that the U.S. Environmental Protection Agency (EPA) has determined that the ArcelorMittal USA Inc. (ArcelorMittal) – Indiana Harbor West facility (IHW Facility) located at 3001 Dickey Road in East Chicago, Indiana is in violation of the Clean Air Act (the CAA) and associated state pollution control requirements.

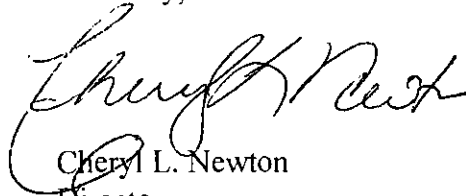
The EPA is sending this Notice of Violation and Finding of Violation (NOV/FOV) to notify you that at the IHW Facility we have identified violations of the facility's Title V Permit, the National Emission Standards for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities at 40 C.F.R. Part 63, Subpart FFFFFF and the Indiana State – Implementation Plan.

Section 113 of the CAA gives us several enforcement options to resolve these violations, including: issuing an administrative compliance order, issuing an administrative penalty order, bringing a judicial civil action and bringing a judicial criminal action. The option we select, in part, depends on the efforts taken by ArcelorMittal to correct the alleged violations and the timeframe in which you can demonstrate and maintain continuous compliance with the requirements cited in the NOV/FOV.

Before we determine which enforcement option is appropriate, we are offering you the opportunity to request a conference with us about the violations alleged in the NOV/FOV. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply and the steps you will take to prevent future violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

The EPA contact in this matter is Monica Onyszko. You may call her at 312-353-5139 if you wish to request a conference. Legal questions should be directed to Cynthia A. King, Associate Regional Counsel, at 312-886-6831. The EPA hopes that this NOV/FOV will encourage ArcelorMittal's compliance with the requirements of the CAA.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl L. Newton". The signature is fluid and cursive, with the first name "Cheryl" being more prominent than the last name "Newton".

Cheryl L. Newton  
Director  
Air and Radiation Division

Enclosure

cc: Phil Perry, Chief  
Compliance and Enforcement Branch  
Office of Air Quality  
Indiana Department of Environmental Management

**United States Environmental Protection Agency  
Region 5**

**IN THE MATTER OF:**

ArcelorMittal USA Inc. –  
Indiana Harbor West  
East Chicago, Indiana

Proceedings Pursuant to  
the Clean Air Act,  
42 U.S.C. §§ 7401 et seq.

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**NOTICE OF VIOLATION AND  
FINDING OF VIOLATION**

**EPA-5-11-IN-10**

**NOTICE AND FINDING OF VIOLATION**

ArcelorMittal USA Inc. (ArcelorMittal) owns and operates an iron and steel manufacturing facility located at 3001 Dickey Road in East Chicago, Indiana (IHW Facility).

The United States Environmental Protection Agency (EPA) is sending this Notice of Violation and Finding of Violation (NOV/FOV) pursuant to Sections 113(a)(1) and (3) of the Clean Air Act (the CAA), 42 U.S.C. § 7413(a)(1) and (3), to notify ArcelorMittal that at the IHW Facility we have identified violations of the facility's Title V Permit, the National Emission Standards for Hazardous Air Pollutants for Integrated Iron and Steel Manufacturing Facilities (Iron and Steel NESHAP) at 40 C.F.R. Part 63, Subpart FFFFF and the Indiana State Implementation Plan (SIP).

**I. REGULATORY PROVISIONS**

The permits and regulatory provisions relevant to this NOV/FOV are as follows:

Title V

- a. Title V of the CAA, 42 U.S.C. §§ 7661a-7661f, establishes an operating permit program for certain sources, including "major sources." Pursuant to Section 502(b) of the CAA, 42 U.S.C. § 7661a(b), on July 21, 1992, 57 Fed. Reg. 32295, the EPA promulgated regulations establishing the minimum elements of a permit program to be administered by any air pollution control agency. These regulations are codified at 40 C.F.R. Part 70.
- b. 40 C.F.R. § 70.2 defines "major source," in part, as any stationary source belonging to a single major industrial grouping and that directly emits or has the potential to emit 100 tons per year (tpy) of any air pollutant, as defined under Section 302 of the CAA, 42 U.S.C. § 7602.
- c. 40 C.F.R. § 70.7(b) states that no source subject to Title V may operate the source except in compliance with a Title V permit.

- d. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), states that after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate the source except in compliance with its Title V permit.
- e. The EPA promulgated final interim approval of the Indiana Title V program on November 14, 1995, 60 Fed. Reg. 57191, and the program became effective on that date.
- f. The regulation at 40 C.F.R. § 70.6(b)(1) specifies that all terms and conditions in a permit issued under a Part 70 program, including any provisions designed to limit a source's potential to emit, are enforceable by the EPA under the CAA.
- g. The EPA approved 326 IAC 2-7-5, governing Title V permit content, effective December 14, 1995, 60 Fed. Reg. 57188, as part of the Indiana SIP.
  - i. 326 IAC 2-7-5(1) provides that Title V permits shall incorporate emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of a Part 70 permit issuance.
- h. The EPA approved 326 IAC 2-7-6, governing compliance requirements, effective December 14, 1995, 60 Fed. Reg. 57188, as part of the Indiana SIP.
  - i. 326 IAC 2-7-6(1) provides that Title V permits issued under this rule shall contain requirements with respect to compliance certification, testing, monitoring, reporting and record keeping sufficient to assure compliance with the terms and conditions of a Part 70 permit consistent with Section 5(3) of this rule.
  - ii. 326 IAC 2-7-6(6) provides that Title V permits issued under this rule shall be subject to provisions as may be required by the commissioner.
  - iii. 326 IAC 2-7-10.5(a)(3) provides that (a) An owner or operator of a Part 70 source proposing to (3) otherwise modify the source as described in this section shall submit a request for a modification approval in accordance with this section.
- i. The IHW Facility is subject to Title V Permit, No. T089-7099-00318, issued by the Indiana Department of Environmental Management (IDEM) on December 7, 2004. Additionally, during the duration of time under investigation in this document, the IHW Facility has also operated under a/an:

- i. Administrative Amendment, No. 089-21088-00318 (issued July 19, 2005);
  - ii. Minor Permit Modification, No. 089-20921-00318 (issued September 8, 2005);
  - iii. Minor Source Modification, No. 089-23099-00318 (issued July 27, 2006);
  - iv. Minor Permit Modification, No. 089-23361-00318 (issued September 22, 2006);
  - v. Minor Source Modification, No. 089-23926-00318 (issued March 8, 2007);
  - vi. First Significant Permit Modification, No. 089-24076-00318 (issued on May 4, 2007);
  - vii. Administrative Amendment, No. 089-26376-00318 (issued on May 16, 2008);
  - viii. Significant Source Modification, No. 089-26477-00318 (issued on November 17, 2008);
  - ix. Significant Permit Modification, No. 089-26506-00318 (issued on December 5, 2008);
  - x. Minor Permit Modification, No. 089-27280-00318 (issued March 24, 2009);
  - xi. Minor Source Modification, No. 089-29339-00318 (issued July 6, 2010)
  - xii. Significant Permit Modification, No. 089-29300-00318 (issued on September 8, 2010); and
  - xiii. Administrative Amendment, No. 089-29863-00318 (issued on December 10, 2010).
- j. The following provisions are found in the IHW Facility's Title V permit:
- i. Condition B.20 - A modification, construction or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5;
  - ii. Condition C.1(a) - Pursuant to 326 IAC 5-1-2, opacity shall not exceed an average of twenty percent (20%) in any one six-minute averaging period as determined in 326 IAC 5-1-4;

- iii. Condition C.6 - Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation;
- iv. Condition D.1.2(d) - The Permittee shall meet each emission limitation in 40 C.F.R. § 63.7790 that applies to the No. 3 Blast Furnace Casthouse Roof Monitor and No. 4 Blast Furnace Casthouse Roof Monitor;
- v. Condition D.1.2(e) - The Permittee shall meet each operation and maintenance requirement in 40 C.F.R. § 63.7800 that applies to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse and required capture and control equipment;
- vi. Condition D.1.9(d)(2) - In order to minimize particulate matter (PM) emissions to comply with D.1.4: The iron and slag runners shall be equipped with covers and natural gas fired lances placed in appropriate areas at the No. 4 Blast Furnace for fume suppression during the cast;
- vii. Condition D.1.9(d)(3) - In order to minimize PM emissions to comply with D.1.4: The iron and slag runner covers can be removed during a cast for required maintenance/malfunction and shall be promptly returned in position;
- viii. Condition D.1.10(a) - Visible emission notations of the No. 4 Blast Furnace Casthouse Baghouse shall be performed once per day during normal daylight operations when exhausting to the atmosphere;
- ix. Condition D.2.2(e) - The Permittee shall meet each operation and maintenance requirement in 40 C.F.R. § 63.7800 that applies to the Sinter Plant and required capture and control equipment;
- x. Condition D.2.3(a) - Total suspended particulate (TSP) emissions from the Sinter Plant Windbox exhausting to stack shall not exceed 0.02 grains per dry standard cubic foot (gr/dscf) of exhaust air and 49.70 pounds per hour (lbs/hour);
- xi. Condition D.2.3(b) - TSP emissions from the Sinter Plant discharge (breaker) exhausting to stack shall not exceed 0.02 gr/dscf of exhaust air and 18.05 lbs/hour;
- xii. Condition D.2.4 - Pursuant to 326 IAC 7-4-1.1(c)(14)(C), sulfur dioxide (SO<sub>2</sub>) emissions from the Sinter Plant Windbox shall not exceed 1.0 pound of SO<sub>2</sub> per ton of process material and 240 pounds of SO<sub>2</sub> per hour;

- xiii. Condition D.2.7(e) - The Permittee shall demonstrate continuous compliance with the emissions limitations of the NESHAP for Integrated Iron and Steel Manufacturing Facilities that apply to the Sinter Plant and required capture and control equipment in accordance with 40 C.F.R. § 63.7833;
- xiv. Condition D.2.12(a) - Following procedures in 326 IAC 8-13-5, at least one Sinter Plant Windbox gas volatile organic compound (VOC) emissions monitoring sample must be analyzed during three designated periods of an operating day;
- xv. Condition D.3.2(b) - The Permittee shall meet the emission limitation in 40 C.F.R. § 63.7790 that applies to the roof monitor;
- xvi. Condition D.3.12 - The reladle/desulfurization baghouse, the ladle metallurgical facility (LMF) baghouse, the main electrostatic precipitator (ESP), the carbon monoxide scrubber and flare shall be in operation at all times when associated processes are in operation;
- xvii. Condition D.3.20(a) - The significant permit modification application shall be consistent with 326 IAC 2-7-12, etc.;
- xviii. Condition D.3.5(b) - The opacity limits for basic oxygen furnace (BOF) operations found in this section shall be complied with and shall take precedence over those in 326 IAC 5-1-2 with which they conflict. Visible emissions from the BOF main ESP stack shall not exceed 20% opacity for a six-minute average;
- xix. Condition D.3.5(c) - The opacity limits for BOF operations found in this section shall be complied with and shall take precedence over those in 326 IAC 5-1-2 with which they conflict. Visible emissions from the BOF roof monitor shall not exceed 20% opacity for a three-minute average; and
- xx. Condition D.8.4(a)(1) - All parts of the gasoline dispensing facility vapor collection and control system which can be visually inspected must be checked daily by the operator of the facility for malfunctions.
- xxi. Condition B.9, and previously Condition B.8 of the IHW Facility's Title V permit, require that ArcelorMittal submit compliance monitoring reports which are certified to be true, accurate and complete.

#### Iron and Steel NESHAP

The IHW Facility is subject to the Iron and Steel NESHAP, 40 C.F.R. Part 63,

Subpart FFFFFF.

The following requirements are found in the Iron and Steel NESHAP:

- a. 40 C.F.R. § 63.7790(a) - You must meet each emission limit and opacity limit in Table 1 to this subpart that applies to you;
- b. 40 C.F.R. § 63.7800(b) - You must prepare and operate at all times according to a written operation and maintenance plan for each capture system or control device subject to an operating limit in § 63.7790(b);
- c. 40 C.F.R. § 63.7833(a) - You must demonstrate continuous compliance for each affected source subject to an emission or opacity limit in 40 C.F.R. § 63.7790(a) by meeting the requirements in Table 3 to this subpart; and

Table 1 of the Iron and Steel NESHAP – For . . .

- i. (7) Each casthouse at an existing blast furnace (b) You must not cause to be discharged to the atmosphere any secondary emissions that exit any opening in the casthouse or structure housing the blast furnace that exhibit opacity greater than 20% (six-minute average) and
- ii. (12) Each roof monitoring at an existing BOF shop, you must not cause to be discharged to the atmosphere any secondary emissions that exit any opening in the BOF shop or any other building housing the BOF or BOF shop operation that exhibit opacity greater than 20% (three-minute average).
- d. Table 3 of the Iron and Steel NESHAP - For (1) each windbox exhaust stream at an existing sinter plant, you must demonstrate continuous compliance by (a) maintaining emissions of particulate matter at or below 0.4 lbs/ton of product sinter.

#### Indiana SIP

- a. The EPA approved 326 IAC 2-7-12, governing permit modification, effective December 14, 1995, 60 Fed. Reg. 57188, as part of the Indiana SIP.
- b. The EPA approved 326 IAC 5-1-2, governing visible emissions, effective June 16, 1997, 62 Fed. Reg. 18521, as part of the Indiana SIP.
  - i. 326 IAC 5-1-2(2)(B) provides that visible emissions from a facility located in Lake County shall not exceed an average of 20% opacity in twenty-four consecutive readings unless otherwise specified in 326 IAC 6-1-10.1. This visible emission limit shall supersede the visible emissions limit contained in clause (A).



- c. The EPA approved 326 IAC 6.8, governing particulate matter, effective May 22, 2006, 71 Fed. Reg. 14383, as part of the Indiana SIP.
  - i. 326 IAC 6.8-2-21 provides that the facility's Sinter Plant Discharge Stack shall not exceed 0.02 gr/dscf. The facility's Sinter Plant Windbox Stack shall not exceed 49.70 lbs/hour.
  - ii. 326 IAC 6.8-3-3 provides that the facility's BOF Main Stack shall not exceed 20% opacity for a six-minute average. The BOF Roof Monitor shall not exceed 20% opacity for a six-minute average.
- d. According to Condition D.2.4 of its Title V permit, ArcelorMittal is subject to 326 IAC 7-4-1.1(c)(14)(C). On April 8, 2005, supplemented on July 6, 2005, Indiana requested a SIP revision for the control of SO<sub>2</sub> emissions in Lake County, Indiana. The EPA approved the SIP revision, 326 IAC 7-4.1-(01-21), effective October 26, 2005, 70 Fed. Reg. 56129. The new rule, 326 IAC 7-4.1, replaces 326 IAC 7-4-1.1, which was repealed.
  - i. 326 IAC 7-4.1-10(3) provides that the facility Sinter Plant Windbox must meet a 240 lbs/hour SO<sub>2</sub> emission limit.
- e. The EPA approved 326 IAC 8-4-6, governing gasoline dispensing facilities, effective January 3, 2000, 64 Fed. Reg. 59642, as part of the Indiana SIP.
  - i. 326 IAC 8-4-6(f)(4)(A) provides that all parts of the vapor collection and control system which can be visually inspected must be checked daily by the operator of the facility for malfunctions.
- f. The EPA approved 326 IAC 8-13-6, governing control measure operation, maintenance and monitoring, effective September 5, 2000, 65 Fed. Reg. 41350, as part of the Indiana SIP.
  - i. 326 IAC 8-13-6(c)(1) provides that following procedures in 326 IAC 8-13-5, at least one sinter plant sample must be analyzed during three designated periods of an operating day.

Section 113(a)(1)-(3) of the CAA, 42 U.S.C. § 7413(a)(1)-(3), authorizes the Administrator to initiate an enforcement action whenever, on the basis of any available information, the Administrator finds that any person has violated or is in violation of a requirement or prohibition of, among others, any implementation plan or permit, Title I or Title V of the CAA, or any rule promulgated, issued or approved under Title I or Title V of the CAA.

## **II. BASIS FOR VIOLATIONS**

The violations alleged in this NOV/FOV are based on the following:

- a. Quarterly Deviation and Compliance Monitoring Report: December 7 - 31, 2004;
- b. Quarterly Deviation and Compliance Monitoring Report: January - March 2005;
- c. Quarterly Deviation and Compliance Monitoring Report: April - June 2005;
- d. Quarterly Deviation and Compliance Monitoring Report: July - September 2005;
- e. Quarterly Deviation and Compliance Monitoring Report: October - December 2005;
- f. Quarterly Deviation and Compliance Monitoring Report: January - March 2006;
- g. Quarterly Deviation and Compliance Monitoring Report: April - June 2006;
- h. Quarterly Deviation and Compliance Monitoring Report: July - September 2006;
- i. Quarterly Deviation and Compliance Monitoring Report: October - December 2006;
- j. Quarterly Deviation and Compliance Monitoring Report: January - March 2007;
- k. Quarterly Deviation and Compliance Monitoring Report: April - June 2007;
- l. Quarterly Deviation and Compliance Monitoring Report: July - September 2007;
- m. Quarterly Deviation and Compliance Monitoring Report: October - December 2007;
- n. Quarterly Deviation and Compliance Monitoring Report: January - March 2008;
- o. Quarterly Deviation and Compliance Monitoring Report: April - June 2008;
- p. Quarterly Deviation and Compliance Monitoring Report: July - September 2008;
- q. Quarterly Deviation and Compliance Monitoring Report: October - December 2008;
- r. Quarterly Deviation and Compliance Monitoring Report: January - March 2009;
- s. Quarterly Deviation and Compliance Monitoring Report: April - June 2009;
- t. Quarterly Deviation and Compliance Monitoring Report: July - September 2009;
- u. Quarterly Deviation and Compliance Monitoring Report: October - December 2009;

- v. Quarterly Deviation and Compliance Monitoring Report: January - March 2010;
- w. Quarterly Deviation and Compliance Monitoring Report: April - June 2010;
- x. Quarterly Deviation and Compliance Monitoring Report: July - September 2010;
- y. Quarterly Deviation and Compliance Monitoring Report: October - December 2010;
- z. Quarterly Deviation and Compliance Monitoring Report: January - March 2011;
- aa. Semiannual Deviation and Compliance Monitoring Report: May 22 - June 30, 2006;
- bb. Semiannual Deviation and Compliance Monitoring Report: July 1 - December 31, 2006;
- cc. Semiannual Deviation and Compliance Monitoring Report: January 1 - June 30, 2007;
- dd. Semiannual Deviation and Compliance Monitoring Report: July 1 - December 31, 2007;
- ee. Semiannual Deviation and Compliance Monitoring Report: January 1 - June 30, 2008;
- ff. Semiannual Deviation and Compliance Monitoring Report: July 1 - December 31, 2008;
- gg. Semiannual Deviation and Compliance Monitoring Report: January 1 - June 30, 2009;
- hh. Semiannual Deviation and Compliance Monitoring Report: July 1 - December 31, 2009;
- ii. Semiannual Deviation and Compliance Monitoring Report: January 1 - June 30, 2010;
- jj. Semiannual Deviation and Compliance Monitoring Report: July 1 - December 31, 2010;
- kk. BOF Precipitator Opacity Monitor – Excess Emissions Report: October - December 2004;

- ll. BOF Precipitator Opacity Monitor – Excess Emissions Report: January - March 2005;
- mm. BOF Precipitator Opacity Monitor – Excess Emissions Report: April - June 2005;
- nn. BOF Precipitator Opacity Monitor – Excess Emissions Report: July - September 2005;
- oo. BOF Precipitator Opacity Monitor – Excess Emissions Report: October - December 2006;
- pp. BOF Precipitator Opacity Monitor – Excess Emissions Report: January - March 2006;
- qq. BOF Precipitator Opacity Monitor – Excess Emissions Report: April - June 2006;
- rr. BOF Precipitator Opacity Monitor – Excess Emissions Report: July - September 2006;
- ss. BOF Precipitator Opacity Monitor – Excess Emissions Report: October - December 2006;
- tt. BOF Precipitator Opacity Monitor – Excess Emissions Report: January - March 2007;
- uu. BOF Precipitator Opacity Monitor – Excess Emissions Report: April - June 2007;
- vv. BOF Precipitator Opacity Monitor – Excess Emissions Report: July - September 2007;
- ww. BOF Precipitator Opacity Monitor – Excess Emissions Report: October - December 2007;
- xx. BOF Precipitator Opacity Monitor – Excess Emissions Report: January - March 2008;
- yy. BOF Precipitator Opacity Monitor – Excess Emissions Report: April - June 2008;
- zz. BOF Precipitator Opacity Monitor – Excess Emissions Report: July - September 2008;
- aaa. BOF Precipitator Opacity Monitor – Excess Emissions Report: October - December 2008;
- bbb. BOF Precipitator Opacity Monitor – Excess Emissions Report: January - March 2009;

- ccc. BOF Precipitator Opacity Monitor – Excess Emissions Report: April - June 2009;
- ddd. BOF Precipitator Opacity Monitor – Excess Emissions Report: July - September 2009;
- eee. BOF Precipitator Opacity Monitor – Excess Emissions Report: October - December 2009;
- fff. BOF Precipitator Opacity Monitor – Excess Emissions Report: January - March 2010;
- ggg. BOF Precipitator Opacity Monitor – Excess Emissions Report: April - June 2010;
- hhh. BOF Precipitator Opacity Monitor – Excess Emissions Report: July - September 2010;
- iii. BOF Precipitator Opacity Monitor – Excess Emissions Report: October - December 2010;
- jjj. BOF Precipitator Opacity Monitor – Excess Emissions Report: January - March 2011;
- kkk. Stack Test performed on Sinter Plant Windbox – April 24, 2007;
- lll. September 10, 2007 certified letter from IDEM to ArcelorMittal informing them of failure to apply for a proper permit for a pneumatic conveyance system used for lime injection into a LMF and the associated permit application;
- mmm. Observations from an inspection conducted by the EPA at the IHW Facility on November 29, 2006; and
- nnn. Visible emission observations from the roof monitors of the BOF Shop and Nos. 3 and 4 Blast Furnaces that were conducted by a certified inspector in accordance with the EPA Method 9, 40 C.F.R. Part 60, Appendix A.

### **III. EXPLANATION OF VIOLATIONS**

The EPA found the following violations at the ArcelorMittal IHW Facility:

a. Sinter Plant PM at Discharge Stack

Regulated by: Title V Permit, Condition D.2.3(b)  
Indiana SIP 326 IAC 6.8-2-21

Source(s): 2aa

Date(s)	Limit	Exceedance
08/01/06	0.02 gr/dscf	Degree Unknown

b. Sinter Plant PM at Windbox Stack

Regulated by: Title V Permit, Condition D.2.3(a)  
Indiana SIP 326 IAC 6.8-2-21

Source(s): 2i, 2k, 2l, 2o, 2bb, 2dd, 2jjj

Date(s)	Limit	Exceedance
08/03/06	49.70 lbs/hour	59.17 lbs/hour
10/27/06	49.70 lbs/hour	51.12 lbs/hour
04/24/07	49.70 lbs/hour	65.28 lbs/hour
06/26/07	49.70 lbs/hour	63.71 lbs/hour
08/23/07	49.70 lbs/hour	56.79 lbs/hour
06/10/08*	49.70 lbs/hour	Degree Unknown
06/10/08*	49.70 lbs/hour	51.07 lbs/hour

NOTE: \* - Diagnostic tests performed caused exceedances in two of four runs.

c. Sinter Plant PM at Windbox Stack

Regulated by: Title V Permit, Condition D.2.7(e)  
Iron and Steel NESHAP, Tables 1 and 3

Source(s): 2k, 2dd, 2jjj

Date(s)	Limit	Exceedance
04/24/07	0.4 lbs/ton	0.48 lbs/ton
06/26/07	0.4 lbs/ton	0.53 lbs/ton
01/15/08*	0.4 lbs/ton	0.46 lbs/ton
01/15/08*	0.4 lbs/ton	0.46 lbs/ton
01/15/08*	0.4 lbs/ton	0.46 lbs/ton
06/10/08*	0.4 lbs/ton	Degree Unknown
06/10/08*	0.4 lbs/ton	0.41 lbs/ton

NOTE: \* - Exceedances occurred during diagnostic tests.

d. Sinter Plant SO<sub>2</sub> at Windbox Stack

Regulated by: Title V D.2.4  
Indiana SIP 326 IAC 7-4.1-10(3)

Source(s): 2h, 2l

Date(s)	Limit	Exceedance
09/29/06	240 lbs/hour	256.4 lbs/hour
07/24/07	240 lbs/hour	361.7 lbs/hour

e. Sinter Plant O&M Plan Deviation

Regulated by: Title V Permit, Condition D.2.2(e)  
Iron and Steel NESHAP, 40 C.F.R. § 63.7800(b)

Source(s): 2n

Deviations reported for minimum scrubber fan amp reading:

Dates: 07/01/06 to 07/03/06  
Shorter periods of deviations also reported.

f. Sinter Plant Windbox VOC Emissions Monitoring

Regulated by: Title V Permit, Condition D.2.12(a)  
Indiana SIP 326 IAC 8-13-5

Source(s): 2b, 2c, 2d, 2e, 2f, 2g, 2h, 2i, 2j, 2k, 2l, 2m, 2n, 2o, 2p, 2z, 2aa, 2bb, 2cc, 2ee

Failed to analyze one sample during each of three operating periods of an operating day:

Dates: 02/02/05, 02/10/05, 02/16/05, 02/22/05, 03/31/05, 04/05/05, 09/08/05, 12/16/05, 12/22/05, 12/28/05, 02/07/06, 05/25/06, 06/02/06, 06/22/06, 07/21/06, 08/16/06, 10/25/06, 12/15/06, 02/04/07, 04/26/07, 05/06/07, 05/16/07, 05/23/07, 06/28/07, 08/26/07, 09/14/07, 09/26/07, 10/28/07, 11/18/07, 12/05/07, 01/29/08, 02/07/08, 03/08/08, 03/14/08, 04/09/08, 04/12/08, 04/30/08, 05/27/08, 05/31/08, 06/04/08, 06/08/08, 06/22/08, 06/27/08, 07/05/08, 07/21/08, 07/23/08, 08/26/08

g. No. 3 Blast Furnace Opacity at Roof Monitor

Regulated by: Title V Permit, Condition C.1(a)  
 Title V Permit, Condition D.1.2(d)  
 Indiana SIP 326 IAC 5-1-2(2)(B)  
 Iron and Steel NESHAP, Tables 1 and 3

Source(s): 2h, 2l, 2m, 2n, 2o, 2p, 2q, 2cc, 2dd, 2ee, 2mmm

Date(s)	Limit	Exceedance
07/31/06	20%, 6-min average	69%, 6-min average (6 mins = 0.1 hours)
08/03/06	20%, 6-min average	2 6-min averages (12 mins = 0.2 hours)
09/12/07	20%, 6-min average	26.5%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/12/07	20%, 6-min average	21.9%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/12/07	20%, 6-min average	22.3%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/12/07	20%, 6-min average	21.3%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/13/07	20%, 6-min average	23.3%, 6-min average (6 mins = 0.1 hours)
09/13/07	20%, 6-min average	24.6%, 6-min average (6 mins = 0.1 hours)
09/13/07	20%, 6-min average	32.9%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/13/07	20%, 6-min average	30.6%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/19/07	20%, 6-min average	22.5%, 6-min average (6 mins = 0.1 hours)
09/19/07	20%, 6-min average	20.8%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/19/07	20%, 6-min average	20.4%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/19/07	20%, 6-min average	20.2%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/19/07	20%, 6-min average	24.4%, 6-min average Read by contractor (6 mins = 0.1 hours)



Date(s)	Limit	Exceedance
09/19/07	20%, 6-min average	23.5%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/19/07	20%, 6-min average	35.4%, 6-min average Read by contractor (6 mins = 0.1 hours)
11/01/07	20%, 6-min average	2 6-min averages* (12 mins = 0.2 hours)
03/19/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)
04/10/08	20%, 6-min average	1? 6-min average* (6 mins = 0.1 hours)
04/25/08	20%, 6-min average	? 6-min averages* (Duration: 4:00 - 19:00)
06/20 - 06/25/2008	20%, 6-min average	? 6-min averages* (Duration: 13:00 - ?)
07/12/08	20%, 6-min average	1 6-min average* (6 mins = 0.1 hours)
08/03/08	20%, 6-min average	1 6-min average* (6 mins = 0.1 hours)
08/03/08	20%, 6-min average	1 6-min average* (6 mins = 0.1 hours)
08/04 - 08/05/08	20%, 6-min average	? 6-min averages* (Duration: 12:38 - 14:45)
11/09/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)
11/09/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)

NOTE: \* - ArcelorMittal did not do Method 9, but reports that given the circumstances, opacity may have been violated and is approximated.

h. No. 4 Blast Furnace Opacity at Roof Monitor

Regulated by: Title V Permit, Condition C.1(a)  
Title V Permit, Condition D.1.2(d)  
Indiana SIP 326 IAC 5-1-2(2)(B)  
Iron and Steel NESHAP, Tables 1 and 3

Source(s): 2c, 2g, 2j, 2l, 2m, 2n, 2o, 2p, 2x, 2z, 2bb, 2cc, 2dd, 2ee, 2jj, 2mmm

Date(s)	Limit	Exceedance
06/21/05	20%, 6-min average	Degree Unknown
06/30/05	20%, 6-min average	Degree Unknown
06/09/06	20%, 6-min average	30%, 6-min average (6 mins = 0.1 hours)
06/12/06	20%, 6-min average	22.5%, 6-min average (6 mins = 0.1 hours)
02/23/07	20%, 6-min average	Degree Unknown, (15 mins = 0.25 hours)
09/05/07	20%, 6-min average	24.6%, 6-min average Read by contractor (6 mins = 0.1 hours)

Date(s)	Limit	Exceedance
09/20/07	20%, 6-min average	26.0%, 6-min average (6 mins = 0.1 hours)
09/20/07	20%, 6-min average	22.9%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/20/07	20%, 6-min average	24.6%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/25/07	20%, 6-min average	25.6%, 6-min average (6 mins = 0.1 hours)
09/25/07	20%, 6-min average	21.9%, 6-min average (6 mins = 0.1 hours)
09/25/07	20%, 6-min average	22.5%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/25/07	20%, 6-min average	40.2%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/25/07	20%, 6-min average	44.2%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/25/07	20%, 6-min average	22.1%, 6-min average Read by contractor (6 mins = 0.1 hours)
09/25/07	20%, 6-min average	20.6%, 6-min average Read by contractor (6 mins = 0.1 hours)
10/10/07	20%, 6-min average	2 6-min averages* (12 mins = 0.2 hours)
10/13/07	20%, 6-min average	2 6-min averages* (12 mins = 0.2 hours)
12/10/07	20%, 6-min average	2 6-min averages* (12 mins = 0.2 hours)
01/09/08	20%, 6-min average	22.9%, 6-min average Read by contractor (6 mins = 0.1 hours)
01/24/08	20%, 6-min average	1 6-min average* (6 mins = 0.1 hours)
04/09/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)
04/18/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)
04/30/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)
05/22/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)
06/12/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)
06/12/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)
06/12/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)
06/19/08	20%, 6-min average	1 6-min average (6 mins = 0.1 hours)

Date(s)	Limit	Exceedance
07/26/08	20%, 6-min average	1 6-min average* (6 mins = 0.1 hours)
08/05/08	20%, 6-min average	1 6-min average* (6 mins = 0.1 hours)
08/11/08	20%, 6-min average	1 6-min average* (6 mins = 0.1 hours)
09/10/08	20%, 6-min average	1 6-min average* (6 mins = 0.1 hours)
09/29/08	20%, 6-min average	1 6-min average* (6 mins = 0.1 hours)
11/20/08	20%, 6-min average	? 6-min averages*
09/17/10	20%, 6-min average	2 6-min averages* (6 mins = 0.2 hours) (occurred at the backdraft stack)
12/29/10	20%, 6-min average	3 6-min averages* (18 mins = 0.3 hours)

NOTE: \* - ArcelorMittal did not do Method 9 readings, but reported that given the circumstances, opacity may have been violated and is approximated.

i. No. 4 Blast Furnace VE Notations at Casthouse Baghouse

Regulated by: Title V Permit, Condition D.1.10(a) /D.1.16(c)  
Indiana SIP 326 IAC 2-7-6

Source(s): 2i, 2l, 2m, 2n, 2z

Failed to perform VE notations once per day:

Dates: 10/27/06, 11/21/06, 12/10/06, 12/16/06, 07/11/07, 07/12/07,  
08/31/07, 09/19/07, 10/24/07, 11/19/07, 11/28/07, 12/17/07,  
01/29/08, 02/03/11

j. No. 4 Blast Furnace O&M Plan Deviation

Regulated by: Title V Permit, Condition D.1.2(e)  
Iron and Steel NESHAP, 40 C.F.R. § 63.7800(b)

Source(s): 2n, 2o, 2ii

Deviations reported for minimum baghouse fan amp reading:

Dates: 07/15/06 to 07/16/06 (Baghouse Fan No. 2), 07/17/06 to 07/18/06  
(Baghouse Fan No. 2), 02/13/07 to 02/14/07 (Baghouse Fan  
No. 1), 04/16/10, 06/02/10 (Baghouse Fans Nos. 1 and 2)  
Shorter periods of deviations also reported.

k. Uncovered Iron and Slag Runners in Nos. 3 and 4 Blast Furnaces

Regulated by: Title V Permit, Condition D.1.9(d)(2) and (3)  
Title V Permit, Condition C.6  
326 IAC 2-7-6(6)

Source(s): 2o, 2p, 2q, 2dd, 2ee, 2mmm

Failed to operate control equipment at all times that the emission units vented to the control equipment are in operation:

ArcelorMittal reported deviations at its No. 3 Blast Furnace on: 01/27/08, 06/26/08, 07/29 - 07/31/08, 08/01/08, 08/04/08 and 08/15/08.

During a November, 29, 2006 inspection, an EPA inspector observed that there were sections of iron and slag runners, each approximately ten feet in length, which were uncovered at No. 4 Blast Furnace.

ArcelorMittal reported additional deviations at No. 4 Blast Furnace on: 02/06/08, 02/07/08, 02/29/08, 03/03/08, 03/14/08, 05/11/08, 05/17/08, 07/29/08, 9/22 - 09/23/08, 09/25 - 09/30/08, 10/01 - 10/03/08, 10/03 - 10/06/08, 10/08 - 10/22/08 and 11/08/08.

l. BOF Opacity at Roof Monitor

Regulated by: Title V Permit, Condition D.3.2(b)  
Title V Permit, Conditions D.3.5(c)/D.3.6(c)  
Indiana SIP 326 IAC 6.8-3-3 (repealed May 30, 2008)  
Indiana SIP 326 IAC 6-1-10.1 (repealed May 22, 2006)  
Indiana SIP 326 IAC 6.8-2-21 (effective May 30 2008)  
Iron and Steel NESHAP, Tables 1 and 3

Source(s): 2c, 2e, 2g, 2l, 2m, 2n, 2o, 2p, 2r, 2s, 2w, 2x, 2z, 2cc, 2dd, 2ee, 2ff, 2jj, 2mmm

Date(s)	Limit	Exceedance
05/24/05	20%, 3-min average	Degree Unknown
12/31/05	20%, 3-min average	Degree Unknown
06/06/06	20%, 3-min average	30%, 3-min average (3 mins = 0.05 hours)
09/05/07	20%, 3-min average	26.3%, 3-min average Read by contractor (3 mins = 0.05 hours)
09/24/07	20%, 3-min average	30.0%, 3-min average Read by contractor (3 mins = 0.05 hours)

Date(s)	Limit	Exceedance
09/24/07	20%, 3-min average	33.3%, 3-min average Read by contractor (3 mins = 0.05 hours)
09/24/07	20%, 3-min average	26.3%, 3-min average Read by contractor (3 mins = 0.05 hours)
09/24/07	20%, 3-min average	31.7%, 3-min average Read by contractor (3 mins = 0.05 hours)
09/24/07	20%, 3-min average	32.1%, 3-min average Read by contractor (3 mins = 0.05 hours)
09/26/07	20%, 3-min average	26.7%, 3-min average Read by contractor (3 mins = 0.05 hours)
09/26/07	20%, 3-min average	30.0%, 3-min average Read by contractor (3 mins = 0.05 hours)
09/26/07	20%, 3-min average	37.5%, 3-min average Read by contractor (3 mins = 0.05 hours)
09/26/07	20%, 3-min average	27.5%, 3-min average Read by contractor (3 mins = 0.05 hours)
09/26/07	20%, 3-min average	25.0%, 3-min average Read by contractor (3 mins = 0.05 hours)
12/06/07	20%, 3-min average	26.3%, 3-min average Read by contractor (3 mins = 0.05 hours)
12/06/07	20%, 3-min average	34.2%, 3-min average Read by contractor (3 mins = 0.05 hours)
12/06/07	20%, 3-min average	28.3%, 3-min average Read by contractor (3 mins = 0.05 hours)
12/06/07	20%, 3-min average	26.7%, 3-min average Read by contractor (3 mins = 0.05 hours)
12/06/07	20%, 3-min average	33.3%, 3-min average Read by contractor (3 mins = 0.05 hours)
12/06/07	20%, 3-min average	20.8%, 3-min average Read by contractor (3 mins = 0.05 hours)
12/06/07	20%, 3-min average	42.9%, 3-min average Read by contractor (3 mins = 0.05 hours)
12/06/07	20%, 3-min average	36.3%, 3-min average Read by contractor (3 mins = 0.05 hours)
12/06/07	20%, 3-min average	21.3%, 3-min average Read by contractor (3 mins = 0.05 hours)

Date(s)	Limit	Exceedance
12/06/07	20%, 3-min average	39.2%, 3-min average Read by contractor (3 mins = 0.05 hours)
12/14/07	20%, 3-min average	1 3-min average* (3 mins = 0.05 hours)
12/14/07	20%, 3-min average	1 3-min average* (3 mins = 0.05 hours)
03/31/08	20%, 3-min average	Duration: 00:00 to 6:30
05/02/08	20%, 3-min average	? 3-min averages*
07/28/08	20%, 3-min average	? 3-min averages*
08/21/08	20%, 3-min average	? 3-min averages*
02/13/09	20%, 3-min average	1 3-min average* (3 mins = 0.05 hours)
02/16/09	20%, 3-min average	1? 3-min averages* (3 mins = 0.05 hours)
02/20/09	20%, 3-min average	1? 3-min averages* (3 mins = 0.05 hours)
02/25/09	20%, 3-min average	1? 3-min averages* (3 mins = 0.05 hours) (Duration: 12:40 - 12:40)
02/25/09	20%, 3-min average	1? 3-min averages* (3 mins = 0.05 hours) (Duration: 12:50 - 12:50)
03/13/09	20%, 3-min average	1 3-min average* (3 mins = 0.05 hours)
03/24/09	20%, 3-min average	1 3-min average* (3 mins = 0.05 hours)
03/25/09	20%, 3-min average	1 3-min average* (3 mins = 0.05 hours)
04/24/09	20%, 3-min average	2 3-min averages* (6 mins = 0.1 hours)
04/29/09	20%, 3-min average	2 3-min averages* (6 mins = 0.1 hours)
05/14/10	20%, 3-min average	3 3-min averages* (9 mins = 0.15 hours)
08/06/10	20%, 3-min average	1 3-min average* (3 mins = 0.05 hours)
08/12/10	20%, 3-min average	2 3-min average* (6 mins = 0.1 hours)
08/13/10	20%, 3-min average	6 3-min average* (18 mins = 0.3 hours)
08/23/10	20%, 3-min average	2 3-min average* (6 mins = 0.1 hours)
08/24/10	20%, 3-min average	2 3-min average* (6 mins = 0.1 hours)
09/13/10	20%, 3-min average	8 3-min average* (24 mins = 0.4 hours)

NOTE: \* - ArcelorMittal did not do Method 9 readings, but reported that given the circumstances, opacity may have been violated and is approximated.

m. BOF Opacity at ESP Stack

Regulated by: Title V Permit, Conditions D.3.5(b)/D.3.6(b)

Indiana SIP 326 IAC 6.8-3-3 (repealed May 30, 2008)

Indiana SIP 326 IAC 6-1-10.1 (repealed May 22, 2006)

Indiana SIP 326 IAC 6.8-2-21 (effective May 30, 2008)

Source(s): 2a, 2b, 2c, 2d, 2e, 2f, 2g, 2h, 2i, 2j, 2k, 2l, 2m, 2n, 2o, 2p, 2q, 2r, 2s, 2v, 2w, 2y, 2ii, 2jj, 2kk, 2ll, 2mm, 2nn, 2oo, 2pp, 2qq, 2rr, 2ss, 2tt, 2uu, 2vv, 2ww, 2xx, 2yy, 2zz, 2aaa, 2bbb, 2fff, 2ggg, 2iii

Date(s)	Limit	Exceedance
4Q 2004	20%, 6-min average	38 6-min averages (228 mins = 3.8 hours)
1Q 2005	20%, 6-min average	292 6-min averages (1,752 mins = 29.2 hours)
2Q 2005	20%, 6-min average	36 6-min averages (216 mins = 3.6 hours)
3Q 2005	20%, 6-min average	19 6-min averages (114 mins = 1.9 hours)
4Q 2005	20%, 6-min average	132 6-min averages (792 mins = 13.2 hours)
1Q 2006	20%, 6-min average	125 6-min averages (750 mins = 12.5 hours)
2Q 2006	20%, 6-min average	33 6-min averages (198 mins = 3.3 hours)
3Q 2006	20%, 6-min average	6 6-min averages (36 mins = 0.6 hours)
4Q 2006	20%, 6-min average	20 6-min averages (120 mins = 2 hours)
1Q 2007	20%, 6-min average	20 6-min averages (120 mins = 2 hours)
2Q 2007	20%, 6-min average	4 6-min averages (24 mins = 0.4 hours)
3Q 2007	20%, 6-min average	4 6-min averages (24 mins = 0.4 hours)
4Q 2007	20%, 6-min average	43 6-min averages (258 mins = 4.3 hours)
1Q 2008	20%, 6-min average	181 6-min averages (1,086 mins = 18.1 hours)
2Q 2008	20%, 6-min average	19 6-min averages (114 mins = 1.9 hours)
3Q 2008	20%, 6-min average	26 6-min averages (156 mins = 2.6 hours)
4Q 2008	20%, 6-min average	25 6-min averages (150 mins = 2.5 hours)
1Q 2009	20%, 6-min average	27 6-min averages (162 mins = 2.7 hours)
2Q 2009	20%, 6-min average	100% compliance (BOF was not idle)
1Q 2010	20%, 6-min average	4 6-min averages (24 mins = 0.4 hours)

Date(s)	Limit	Exceedance
2Q 2010	20%, 6-min average	100% compliance (BOF was not idle)
4Q 2010	20%, 6-min average	5 6-min averages (30 mins = 0.5 hours)

n. Failure to Operate Pollution Control Equipment During Operation of BOF Vessel

Regulated by: Title V Permit, Condition C.6  
326 IAC 2-7-6(6)

Source(s): 2mmm

Failed to operate control equipment at all times that the emission units vented to the control equipment are in operation:

During a November, 29, 2006 inspection, an EPA inspector observed that during tapping in the BOF Shop, the primary emission control device was not on.

o. Gasoline Dispensing Facility Visual Inspections

Regulated by: Title V Permit, Condition D.8.4(1)  
Indiana SIP 326 IAC 8-4-6(e)(4)

Source(s): 2f, 2h

Failed to check system for malfunctions:

Dates: 10/01/05 to 12/31/05, 07/01/06 to 09/30/06

p. Improper Permitting of Pneumatic Conveyance System Used for Lime Injection into LMF

Regulated by: Title V Permit, Condition B.20  
Title V Permit, Condition D.3.20(a)  
326 IAC 2-7-10.5  
326 IAC 2-7-12

Source(s): 2ff; 2006 Permit Application

Failed to submit a permit application prior to construction of the LMF lime silo storage and handling system



- q. Failure to Operate Pollution Control Equipment During Operation of Associated Processes (Reladle/Desulfurization Baghouse)

Regulated by: Title V Permit, Condition D.3.12  
326 IAC 2-7-6(6)

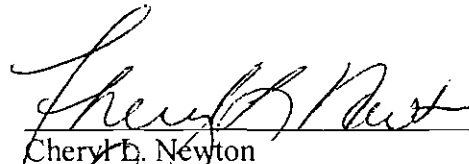
Source(s): 2k

The Reladle/Desulfurization Baghouse shall be in operation at all times when associated processes are in operation. ArcelorMittal reported that on June 29, 2007, the North Reladle/ Desulfurization Baghouse fan was shutdown.

#### IV. ENVIRONMENTAL IMPACT OF VIOLATIONS

- a. Violation of the opacity standards increases public exposure to unhealthy particulate matter. Particulate matter, especially fine particulate, contributes to respiratory problems, lung damage and premature deaths.
- b. Ground level concentrations of SO<sub>2</sub> contribute to respiratory illness, particularly in children and the elderly and aggravate existing heart and lung diseases. Peak levels of SO<sub>2</sub> in the ambient air can cause temporary breathing difficulty for people with asthma who are active outdoors. Longer-term exposures to high levels of SO<sub>2</sub> gas and particles cause respiratory illness and aggravate existing heart disease.
- c. VOCs react with nitrogen oxides in the presence of sunlight to form ground-level ozone, which contributes to respiratory problems such as increased susceptibility to respiratory infection, pulmonary inflammation, painful deep breathing, aggravated asthma and reduced lung capacity.
- d. Violations of the monitoring, recordkeeping, reporting and permitting requirements prevent the EPA from knowing whether an affected facility has maintained compliance with the applicable emission standards.

10/21/11  
Date

  
Cheryl D. Newton  
Director  
Air and Radiation Division

**CERTIFICATION OF MAILING**

I Betty Williams, certify that I sent a Notice of Violation and Finding of Violation, No.

EPA-5-11-IN-10, by Certified Mail, Return Receipt Requested, to:


James Flannery, Environmental Manager  
ArcelorMittal USA Inc. - Indiana Harbor West  
3001 Dickey Road  
East Chicago, Indiana 46312

I also certify that I sent a copy of the Notice of Violation and Finding of Violation,

No. EPA-5-11-IN-10, by first class mail to:

Phil Perry, Chief  
Compliance and Enforcement Branch  
Office of Air Quality  
Indiana Department Environmental Management  
100 North Senate Avenue  
MC 61-53, IGCN 1003  
Indianapolis, Indiana 46206-2251

On the 26 day of October 2011.

  
Betty Williams  
Administrative Professional Assistant  
Planning and Administration Section

CERTIFIED MAIL RECEIPT NUMBER: 70091680 0000 7672 1952